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Charles B. Welch, Jr. cwelch@farrismathews.com

September 25, 2002

VIA HAND DELIVERY

Chairman Sara Kyle Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Re:

Petition of UNE-P Coalition to Open Contested Case Proceeding to Declare Unbundled Switching an Unrestricted Unbundled Network Element Docket No. 02-00207

Dear Chairman Kyle:

Enclosed for filing, please find the original plus thirteen (13) copies of Business Telecom, Inc.'s request for an extension of time to respond to data requests in the referenced docket. Copies have been served upon all parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

FARRIS, MATHEWS, BRANAN, **BOBANGO & HELLEN, P.L.C.**

CBW:lw Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

Re: Petition of UNE-P Coalitie Contested Case Proceeding Unbundled Switching an	to Declare)	Docket No. 02-00207
Unbundled Network Element)	

BUSINESS TELECOM, INC.'S REQUEST FOR AN EXTENSION OF TIME TO RESPOND TO DATA REQUESTS

Business Telecom, Inc. ("BTI") requests an extension of time to respond to the Tennessee Regulatory Authority's ("TRA") Data Requests dated September 18, 2002. In support of this request, BTI respectfully advises the TRA that it has had less than three (3) business days to assimilate the information necessary to respond. Due to staffing limitations and information system capacity, it is impossible for BTI to comply with the September 25, 2002 due date deadline. Further, BTI does not electronically maintain information in a format which would be responsive to the data request without a significant amount of BTI personnel time.

BTI is in the process of preparing responses and will continue its efforts to provide complete and accurate responses. Under the circumstances, however, BTI respectfully requests an extension of time to file its responses until Wednesday, October 9, 2002.

Respectfully submitted,

FARRIS MATHEWS BRANAN BOBANGO & HELLEN, PLC

Charles B. Welch, Jr.

618 Church St., Suite 300

Nashville, TN 37219

(615) 726-1200

Attorney for Business Telecom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, postage prepaid, and via facsimile to the following on this the 5th day of June, 2002.

Guy Hicks, Esq. BellSouth Telecommunications, Inc. 333 Commerce St., Suite 2101 Nashville, TN 37201-3300

Henry Walker Boult, Cummings, Conners & Berry, PLC 414 Union Street, Suite 1600 Nashville, Tennessee 37219

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